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Ticknor K X X

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Reviewed for Addressee
Corres Control RFP

DATE 10-28-93 BY C

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Department of Energy

ROCKY FLATS OFFICE
P O BOX 928
GOLDEN COLORADO 80402-0928

OCT 26 1993

93-DOE-11783

Mr Gary W Baughman, Section Chief
Colorado Department of Health
HMWMD-HWC-B2
4300 Cherry Creek Drive South
Denver, Colorado 80222-1530

Dear Mr Baughman

Enclosed are the meeting minutes and handouts documenting the September 17, 1993, Rocky Flats Plant Mixed Residue Permitting Issues Meeting attended by EG&G Rocky Flats, Inc, the U S Department of Energy and the Colorado Department of Health. These minutes serve as formal documentation of the discussions held and decisions made at the meeting

If you have any questions or comments concerning these minutes, please do not hesitate to call me at 966-4440, Tom Lukow at 966-4561 or John Rampe of my staff at 966-6246

Sincerely,



Michael S Karol
Assistant Manager
for Facility Operations

Enclosure 1 Meeting Minutes
Enclosure 2 Meeting Agenda

cc w/Enclosures 1 & 2
F Dowsett, CDH
M Ward, DOJ
M Une, GC-11
J Kermdge, EM-64
M Karol, AMFO, RFO
J Wienand, DWPD, RFO
T Lukow, WPD, RFO
J Rampe, RPB, RFO
G Nishimoto, WPB, RFO
M Roy, OCC, RFO
T Hedahl, EG&G
J Hilbig, EG&G
A Kallas, EG&G
A Schubert, EG&G
K Ticknor, EG&G

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Oct 23 10 11 AM '93
EG&G Rocky Flats
CORRESPONDENCE

ROCKY FLATS PLANT MIXED RESIDUE PERMITTING MEETING - MEETING MINUTES

Meeting Held September 17, 1993, 2 p m
Colorado Department of Health

Attendees.	Gary Baughman	CDH	Angelo Kallas	EG&G
	Fred Dowsett	CDH	Kirk Ticknor	EG&G
	Tom Lukow	DOE/RFO	Mell Roy	DOE/RFO
	Warren Seyfert	DOE/RFO	Michael Karol	DOE/RFO
	John Rampe	DOE/RFO		
	Matt Urie	DOE/HQ (by telephone)		
	Mary Beth Ward	DOJ (by telephone)		

A. Purpose.

The purpose of this meeting was to clearly define open issues with respect to the application for a permit for mixed residues

B. Discussion

- 1 An agenda and handouts were distributed at the beginning of the meeting (attached) Mr Karol began the meeting by stating that DOE was very interested in working with CDH to resolve whatever issues CDH may have with respect to obtaining a permit for mixed residues
- 2 Mr Baughman noted that CDH is not yet finished with their review of the Part B Permit Modification for Mixed Residues However, he thought that CDH has identified most of the major issues, but more issues may come up during their review of the permit modification and during their inspections He expects CDH's review of the permit modification to be complete by the end of this calendar year
- 3 Due to time constraints, only those issues which have not yet been discussed in detail were discussed during the meeting A summary of those issues follows
 - a. CDH wants more detailed "procedures" and schedule outlining how all mixed residue tanks will be emptied and closed, per 6 CCR 1007-3 Section 264 112(b) Mr Dowsett stated that this is most critical for the tanks destined for closure (the 155, 6, and 68 tanks shown in the handout from the meeting) CDH stated that the "procedures" need to be specific about how remaining inventory will be removed (especially with respect to the safety issues) Also important to CDH is the disposition of the wastes Mr Karol stated that some contingencies may need to be built into these "procedures" to allow flexibility without significant delay Mr Baughman noted that the permit modification and closure plan amendment processes would accommodate any necessary changes

- b. CDH wants detailed decontamination "procedures" for all mixed residue units. It was recognized that decontamination "procedures" may vary, depending on ultimate disposition of individual tanks (e g , tanks may be reused, dismantled, or disposed after they are completely empty)

- c Waste Characterization

- i Mr. Baughman said that sufficient data must be available for the mixed residues at Rocky Flats to properly evaluate adequacy of containment, closure plans, compatibility, and waste handling
 - ii. Mr. Baughman said that the permit modification needs to state what types of waste are in each unit
- d. CDH wants an engineering assessment (by an independent professional engineer if adequate secondary equipment does not exist) to verify fit-for-use for the tanks which remain in the operating section of the permit application. Also, some level of information will be needed for the tanks which are operationally empty and destined for closure. Mr. Baughman stated that without adequate information about what is in each tank, CDH cannot determine the adequacy of secondary containment. He discussed how this characterization information is also a prerequisite to performing an assessment of a tank. Mr. Baughman noted that EPA's tank guide includes information pertaining to this issue.

Also, Mr. Baughman stated that CDH wants drawings showing extent of ancillary equipment (sufficient to allow a walk-down of the system) for all mixed residue tanks. Mr. Baughman said that this is most critical for the 91 tanks for which an operating permit is being sought.

- e CDH wants RFP to identify strategic activities that will identify logical sequences and priorities for permitting

- 4 The next meeting was scheduled to begin at 9 a.m. September 28 at the Rocky Flats Plant

MEETING AGENDA

SUBJECT: OPEN ISSUES PERTAINING TO MIXED RESIDUE PERMITTING

TIME AND LOCATION: 2 p.m., 9/17/93, COLORADO DEPARTMENT OF HEALTH

Objective: Clearly define open issues with respect to the application for a permit for mixed residues.

- 1. Define open issues remaining from the 8/6/93 meeting (minutes attached).**
- 2. Define any other issues which CDH may have identified since the 8/6/93 meeting.**
- 3. Make arrangements for the next meeting to set up a schedule for resolving these issues, and if possible identify the work needed to resolve the issues**